

DANIEL KAHN
Acting Chief

THOMAS J. TYNAN
VA Bar No. 77420 (*pro hac vice*)
Trial Attorney
Criminal Division, Fraud Section
United States Department of Justice
1400 New York Ave., N.W.
Washington, D.C. 20005
Telephone: (202) 768-1136
Email: Thomas.Tynan@usdoj.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

BRADLEY C. REIFLER, *et al.*,
Defendants.

20-CV-00511

GOVERNMENT'S UNOPPOSED MOTION
TO INTERVENE AND TO STAY
PROCEEDINGS

The United States of America (the "Government"), pursuant to Federal Rule of Civil Procedure 24, hereby moves the Court for an order:

- (1) permitting the Government to intervene in the above-captioned civil action;
- (2) staying the above-captioned civil action, with such stay being in effect until the resolution of the criminal case against Defendant Bradley C. Reifler. *See United States. v Reifler*, 20-cr-00512, M.D.N.C.

1 The accompanying Memorandum of Points and Authorities is incorporated into this
2 Motion as if fully set forth herein.

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4 Date: February 10, 2021

Respectfully submitted,

5 DANIEL KAHN
6 Acting Chief
7 Criminal Division, Fraud Section

8 /s/ Thomas J. Tynan
9 Thomas J. Tynan
10 Trial Attorney
11 Criminal Division, Fraud Section
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CERTIFICATE OF SERVICE

I hereby certify, this 10th day of February, 2021, that I caused the foregoing Government's Unopposed Motion to Intervene and Stay Proceedings, the accompanying Memorandum of Points and Authorities in Support, and the proposed order to be electronically filed with the Clerk of Court using the ECF system, which will send notification of such filing to counsel for the parties.

/s/ Thomas J. Tynan

Thomas J. Tynan
Trial Attorney